

## **PERMIT CHECK LIST**

**The following people have reviewed the permit:**

Reviewing Permitting Engineer: \_\_\_\_\_

Air Inspector: \_\_\_\_\_

Air Compliance Manager: \_\_\_\_\_

Date: January 25, 2008

Source Name: Vitex Packaging, Inc. Registration No: 60467 Id. No.: 51-800-00050

Source Location: 1137 Progress Road, Suffolk, Virginia

Mail Address: 1137 Progress Road, Suffolk, Virginia 23434

Source Status: \_\_\_\_\_ Greenfield ☒ Currently operating

Source Classification: \_\_\_\_\_ Minor ☒ SynMinor \_\_\_\_\_ State Major \_\_\_\_\_ PSD Major \_\_\_\_\_ TV Major

Permit Action: Change out some presses and increase throughput to 1.789 million pounds of inks and solvents.

### **Permit Action Program:**

\_\_\_\_\_ NSR ☒ SOP \_\_\_\_\_ TV \_\_\_\_\_ Maj HAP

### **Permit Action Type:**

☒ New / ~~Article 6 Modification (delete one)~~ \_\_\_\_\_ Significant Amendment/Modification  
\_\_\_\_\_ Minor Amendment/Modification \_\_\_\_\_ Administrative Amendment \_\_\_\_\_ Renewal  
\_\_\_\_\_ State Major \_\_\_\_\_ PSD \_\_\_\_\_ Non-Attainment \_\_\_\_\_ General

Y (Y/N) Permit Includes All Emission Units at Source.

Y (Y/N) Permit Allows Source to avoid Title V/MACT/etc.

After this permit, source is: \_\_\_\_\_ Major (A) \_\_\_\_\_ Minor (B) ☒ Synthetic minor (SM)  
( VOC Pollutant, \_\_\_\_\_ Pollutant, \_\_\_\_\_ Pollutant)

### **Permit Application Review**

☒ Permit application submitted, or \_\_\_\_\_ Letter Request

Application Received Date: September 5, 2007

Application Complete Date: December 12, 2007 (Face-to-face meeting at DEQ).

Permit Deadline Date: March 12, 2008

☒ Document Certification Form received

N Confidential information with sanitized copy. If yes, which sections:

\_\_\_\_\_ throughputs \_\_\_\_\_ individual pollutants \_\_\_\_\_ flow diagrams \_\_\_\_\_ calculations  
\_\_\_\_\_ process descriptions \_\_\_\_\_ other (describe)

N/A Copy of letter from local official for greenfield, or major modified sources

N/A Copy of letter sent to FLM if applicable. (Comments)

N/A Notification of Affected State(s)

This permit supersedes permit(s) dated August 2, 2004 and August 22, 2005

### **Regulatory Review**

BACT Determination (check one):

☒ Use of 'low-VOC inks and coatings' for the control of VOC emissions meets BACT (Comments)\_\_\_\_\_

\_\_\_\_\_ TV/SOP/BACT not applicable. (Explain)\_\_\_\_\_

N (Y/N) NSPS/MACT/NESHAPS Applicability: If Y, Subpart(s): Vitex must keep throughput records!

\_\_\_\_\_ NSPS \_\_\_\_\_ MACT \_\_\_\_\_ NESHAPS

**Regulatory Review (cont.)**

Y (Y/N) Existing Rules (9 VAC 5 Chapter 40) Applicability: If Y, Rule(s): 4-24; For non-halogenated Solvents applicable to the existing parts washers.

Toxic Pollutants (check one):

     Exempt, or      in compliance with 9 VAC 5-60-220, or ✓ not evaluated. Facility reports no HAP

Modeling (check one):

     Attached (including background monitors), or

     Copy of approval letter from modeling section,

✓ No modeling required by agency policy (< modeling significance levels, etc.)

Site Suitability:

✓ Site suitable from an air pollution standpoint. Inspection date August 1, 2007.

✓ Calculation sheet(s) attached

N (Y/N) NSR Netting      Comments (Explain Permit History):

N (Y/N) (CAM) Compliance Assurance Monitoring Applicable

Permit includes:      Stack Testing        CEM        VEE by source

**Public Participation**

Y (Y/N) Public Noticed. If yes, Public Notice Date: January xx, 2008.

N (Y/N) Public Notice Comments. If yes, number and nature of comments:

N (Y/N) Public Hearing. If yes, Public Hearing Date:

**EPA Review**

N (Y/N) EPA Review. If yes, Date proposed permit sent to EPA                                 .

N (Y/N) EPA Comments. If yes, give a brief summary   .

**Other Comments and Final Recommendations:**

Comments: Permit action triggered by site inspection which showed that Vitex was exceeding the permitted throughput for inks and coatings of 1,000,000 pounds. Also, the latest plans for the facility has production on the increase and two presses will be replaced. Need to increase throughput of materials and by this permit action, process a new SOP. The NESHAP, Subpart KK applies to printing facilities, but the Vitex operation qualifies as an area source. Vitex has only to keep records. Although there are no HAP emissions, past permits listed a HAP limit of 0.1 tons; just to show them as an area source. This is only necessary because of the "Once In, Always In" rule for the NESHAP.

A new NEI analysis was performed for an increase in throughput of inks and coatings. The result is a VOC emissions increase with future projections rising to about 85 tons total VOC. In order to simplify compliance methods in an industry where numerous materials are utilized everyday, the throughput condition was formulated around the target pollutant; VOC. By limiting the throughput of VOC in tons, it forces the facility to keep detailed records of all material usage and to calculate a material balance for VOCs on a monthly basis.

Modified the boilerplate condition for "VOC Work Practice Standards", condition #4 to specify that VOCs disposed of down the drain were cleared with the local water treatment plant management before this disposal practice was initiated.

Took out the lbs/hour limit for the combined presses, since this could not be tested for or enforced. The facility has requested that the calculated permit limits reflect production for half at 12% max VOC (represents 200%

**Regulatory Review (cont.)**

ink coverage) and half at 7% VOC (represents 100% ink coverage) = 9.5 % VOC. New calculations are by DEQ; see attached spreadsheet. The fuel burning equipment at Vitex includes two space heaters that are exempt. Other emission units are two parts washers; non-halogenated, non-HAP solvents are being used.

**Final Recommendation:** Recommend Approval.

Environmental Engineer's Signature: \_\_\_\_\_

Air Permit Manager's Signature: \_\_\_\_\_

January 15, 2008

Mr. Randy Gleason  
Vice President of Operations  
Vitex Packaging Group, Inc.  
1137 Progress Road  
Suffolk, Virginia, 23434

Location: Suffolk  
Registration No.: 60467

Dear Mr. Gleason:

Attached is a permit to operate a Graphic Arts Package Printing Facility in accordance with the provisions of the Virginia State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution. This permit supersedes your permits dated August 2, 2004 and August 22, 2005.

This permit contains legally enforceable conditions. Failure to comply may result in a Notice of Violation and/or civil charges. Please read all permit conditions carefully.

In the course of evaluating the application and arriving at a final decision to approve the project, the Department of Environmental Quality (DEQ) deemed the application complete on December 12, 2007, and solicited written public comments by placing a newspaper advertisement in the Virginian Pilot on January xx, 2008. A public hearing was held on \_\_\_\_\_. The required comment period, provided by 9 VAC 5-80-1170 D expired on \_\_\_\_\_].

This permit approval to modify and operate shall not relieve Vitex Packaging, Inc. of the responsibility to comply with all other local, state, and federal permit regulations.

The Board's Regulations as contained in Title 9 of the Virginia Administrative Code 5-170-200 provide that you may request a formal hearing from this case decision by filing a petition with the Board within 30 days after this case decision notice was mailed or delivered to you. 9 VAC 5-170-200 provides that you may request direct consideration of the decision by the Board if the Director of the DEQ made the decision. Please consult the relevant regulations for additional requirements for such requests.

As provided by Rule 2A:2 of the Supreme Court of Virginia, you have 30 days from the date you actually received this permit or the date on which it was mailed to you, whichever occurred first, within which to initiate an appeal of this decision by filing a Notice of Appeal with:

David K. Paylor, Director  
Department of Environmental Quality  
P. O. Box 1105  
Richmond, VA 23218-1105

If this permit was delivered to you by mail, three days are added to the thirty-day period in which to file an appeal. Please refer to Part Two A of the Rules of the Supreme Court of Virginia for information on the required content of the Notice of Appeal and for additional requirements governing appeals from decisions of administrative agencies.

If you have any questions concerning this permit, please contact Stephen A. Hackney at (757) 518-2124 or the regional office at (757) 518-2000.

Sincerely,

Jane A. Workman  
Air Permit Manager

jaw/sah/VitexPackaging08SOP.doc

Attachments: Permit

cc: Director, OAPP (electronic file submission)  
Manager, Data Analysis (electronic file submission)  
Manager/Inspector, Air Compliance

## **STATIONARY SOURCE PERMIT TO OPERATE**

This permit supersedes your permits dated August 2, 2004 and August 22, 2005

In compliance with the Federal Clean Air Act and the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution,

Vitex Packaging, Inc.  
1137 Progress Road  
Suffolk, Virginia 23434  
Registration No.: 60467  
AFS Id. No.: 51-800-00050

is authorized to modify and operate

a graphic arts packaging printing facility

located at

1137 Progress Road, Suffolk, Virginia

in accordance with the Conditions of this permit.

Approved on            DRAFT.

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Francis L. Daniel

Permit consists of 7 pages.  
Permit Conditions 1 to 20.

## **INTRODUCTION**

1. This permit approval is based on the permit applications dated August 31, 1995, April 18, 1997, March 6, 1998, October 2, 1998, June 9, 1999, September 8, 1999, November 30, 1999, September 16, 2002, June 4, 2004, June 24, 2005 and August 31, 2007, including amendment information dated October 17, 1995, October 26, 1995, June 27, 1997, September 4, 1997, August 24, 1998, March 23, 1999, May 17, 1999, June 4, 1999, June 22, 1999, January 19, 2000, November 26, 2002, June 17, 2004, July 30, 2004, August 11, 2005, September 18, 2007, October 9, 2007, October 24, 2007 and December 12, 2007. Any changes in the permit application specifications or any existing facilities which alter the impact of the facility on air quality may require a permit. Failure to obtain such a permit prior to construction may result in enforcement action.

Words or terms used in this permit shall have meanings as provided in 9 VAC 5-10-10 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution. The regulatory reference or authority for each condition is listed in parentheses () after each condition.

Annual requirements to fulfill legal obligations to maintain current stationary source emissions data will necessitate a prompt response by the permittee to requests by the DEQ or the Board for information to include, as appropriate: process and production data; changes in control equipment; and operating schedules. Such requests for information from the DEQ will either be in writing or by personal contact.

The availability of information submitted to the DEQ or the Board will be governed by applicable provisions of the Freedom of Information Act, § 2.2-3700 through 2.2-3714 of the Code of Virginia, § 10.1-1314 (addressing information provided to the Board) of the Code of Virginia, and 9 VAC 5-170-60 of the State Air Pollution Control Board Regulations. Information provided to federal officials is subject to appropriate federal law and regulations governing confidentiality of such information.

## **PROCESS REQUIREMENTS**

2. **Equipment List** - Equipment at this facility consists of the following:

<b>Equipment to be installed by this permit</b>				
<b>Reference No.</b>	<b>Equipment Description</b>	<b>Rated Capacity</b>	<b>Federal Requirements</b>	<b>Installation Date</b>
4A	7-station flexographic press with web width of 26 inches	300 feet/minute	N/A	2008
14A	9-station flexographic press with web width of 26 inches	300 feet/minute	N/A	2008

<b>Equipment permitted prior to the date of this permit</b>				
<b>Reference No.</b>	<b>Equipment Description</b>	<b>Rated Capacity</b>	<b>Federal Requirements</b>	<b>Original Permit Date</b>
3	3-station flexographic press with web width of 32 inches	400 feet/minute	N/A	July 5, 1992
4	3-station flexographic press with web width of 31 inches	400 feet/minute	N/A	July 5, 1992
10	5-station flexographic press with web width of 16 inches	300 feet/minute	N/A	July 5, 1992
11	3-station flexographic press with web width of 29 inches	600 feet/minute	N/A	July 5, 1992

12	3-station flexographic press with web width of 40 inches	600 feet/minute	N/A	July 5, 1992
13	3-station flexographic press with web width of 40 inches	600 feet/minute	N/A	November 17, 1995
14	7-station rotogravure/flexographic press with web width of 26 inches	300 feet/minute	N/A	November 17, 1995
16	3-station flexographic press with web width of 29 inches	600 feet/minute	N/A	March 31, 1998
17	5-station flexographic press with web width of 16 inches	300 feet/minute	N/A	March 31, 1998
18	8-station flexographic press with a ninth rotogravure station; 26 inch width	200 feet/minute	N/A	December 13, 2002
19	8-color flexographic printing press with web width of 16 inches	300 feet/minute	N/A	August 2, 2004
20	8-color flexographic printing press with web width of 40 inches	500 feet/minute	N/A	August 22, 2005

<b>Equipment to be removed by this permit</b>				
<b>Reference No.</b>	<b>Equipment Description</b>	<b>Rated Capacity</b>	<b>Federal Requirements</b>	<b>Planned Removal Date</b>
4	3-station flexographic press with web width of 31 inches	400 feet/minute	N/A	January, 2008
14	7-station rotogravure/flexographic press with web width of 26 inches	300 feet/minute	N/A	February, 2008

<b>Equipment installed prior to the date of this permit</b>				
<b>Reference No.</b>	<b>Equipment Description</b>	<b>Rated Capacity</b>	<b>Federal Requirements</b>	<b>Installation Date</b>
PW-1, PW-2	Non-halogenated parts washers	N/A	N/A	1981

<b>Equipment Exempt from Permitting</b>				
<b>Reference No.</b>	<b>Equipment Description</b>	<b>Rated Capacity</b>	<b>Exemption Citation</b>	<b>Exemption Date</b>
SH-1	Space Heater; natural gas	1.0 MMBtu/hour	9 VAC 5-80-1320 B.1	1981
SH-2	Space Heater; natural gas	0.15 MMBtu/hour	9 VAC 5-80-1320 B.1	1981

Specifications included in the permit under this Condition are for informational purposes only and do not form enforceable terms or conditions of the permit.

(9 VAC 5-80-850)

- Emission Controls** – Volatile organic compound (VOC) emissions from the presses (Unit Ref. Nos. 3, 4, 4A, 10-14, 14A, 16-20) shall be controlled by the use of compliant inks or surface coatings. Compliant ink or surface coating means an ink or surface coating conforming to the definition of a high solids, low solvent, or a waterborne ink or surface coating. A high solids ink or surface coating contains 60% or more nonvolatile compounds by volume. A low solvent ink or surface coating means an ink or surface coating which contains not more than 0.5 pounds of VOC per pound of nonvolatile compounds and is used on a packaging rotogravure printing or flexographic printing press. A waterborne ink or surface coating means an ink or surface coating whose volatile portion consists of 75% or more by volume of water and 25% or less by volume of VOC.  
 (9 VAC 5-80-850, 9 VAC 5-50-260 and 9 VAC 5-40-5070 C)



4. **VOC Work Practice Standards** – At all times the disposal of volatile organic compounds shall be accomplished by taking measures, to the extent practicable, consistent with air pollution control practices for minimizing emissions. Volatile organic compounds shall not be intentionally spilled, discarded in sewers which are not connected to a treatment plant (with authorization from the local treatment plant manager), or stored in open containers, or handled in any other manner that would result in evaporation beyond that consistent with air pollution practices for minimizing emissions. (9 VAC 5-50-20 F and 9 VAC 5-80-850)

### **OPERATING LIMITATIONS**

5. **Emission Controls** – Each of the parts washers shall operate in compliance with 9 VAC 5, Chapter 40, Part II, Article 24, Emission Standards for Solvent Metal Cleaning Operations Using Non-Halogenated Solvents, including but not limited to the following:
- a. Each parts washer shall be provided with a cover that can be operated with one hand. The cover should be closed whenever not handling parts in the washer.
  - b. Internal drainage should be provided to collect and return the solvent to a closed container or a solvent cleaning machine.
  - c. Any solvent spray should be a solid, fluid stream (not a fine, atomized or shower-type spray) and at a pressure which does not cause excessive splashing.
  - d. A permanent label, summarizing the operating procedures should be placed on or near each parts washer.
  - e. Waste solvent shall be stored in closed containers.
  - f. The degreaser cover should be closed whenever not handling parts in the cleaner.
  - g. Cleaned parts should drain for at least 15 seconds or until dripping ceases.
- (9 VAC 5-40-3290 C and 9 VAC 5-80-850)
6. **Throughput** – The throughput of Volatile Organic Compounds for all the presses at VITEX shall not exceed 85.0 tons per year, calculated monthly as the sum of each consecutive 12-month period. (9 VAC 5-80-850)
7. **Printing Presses – Shutdown Equipment** – Currently installed presses Ref. Nos. 4 and 14 shall be replaced with the new presses Ref. Nos. 4A and 14A. The permittee shall not operate presses 4A and 14A prior to removal of presses 4 and 14. (9 VAC 5-80-850, 9 VAC 5-20-220 and 9 VAC 5-80-1100)

### **EMISSION LIMITS**

8. **Process Emission Limits** - Emissions from the operation of all the presses combined (Unit Ref. Nos. 3, 4, 4A, 10-14, 14A, 16-20) shall not exceed the limits specified below:

Volatile Organic Compounds

85.0 tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition numbers 3, 4, 6 and 7.

(9 VAC 5-80-850 and 9 VAC 5-50-260)

9. **Facility-wide Emission Limits** - Total emissions from the graphic arts packaging printing facility shall not exceed the limits specified below:

Nitrogen Oxides (as NO <sub>2</sub> )	2.1 tons/yr
Carbon Monoxide	1.8 tons/yr
Volatile Organic Compounds	85.0 tons/yr
Hazardous Air Pollutants (as VOC)	0.1 tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition numbers 3, 4, 5, 6 and 7.

(9 VAC 5-80-850 and 9 VAC 5-50-260)

10. **Visible Emission Limit** - Visible emissions from each press stack shall not exceed five percent (5%) opacity except during one six-minute period in any one hour in which visible emissions shall not exceed ten percent (10%) opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction. (9 VAC 5-50-80, 9 VAC 5-80-850 and 9 VAC 5-50-260)

## **RECORDS**

11. **On Site Records** - The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Tidewater Regional Office. These records shall include, but are not limited to:
- The annual calculated emissions, in tons, of all the volatile organic compound emissions, based on a material balance, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
  - All Material Safety Data Sheets (MSDS), Certified Product Data Sheets (CPDS), or other vendor information as approved by DEQ showing VOC content, toxic compound content, water content, solids content for each coating, adhesive, ink or cleaning solution used.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.

(9 VAC 5-80-850 and 9 VAC 5-50-50)

## **NOTIFICATIONS**

12. **Initial Notifications** – The permittee shall furnish written notification to the Director, Tidewater Regional Office:
- The actual date on which installation of the presses Ref. Nos. 4A and 14A commenced within 10 days after such date.

- b. The anticipated start-up date of the presses Ref. Nos. 4A and 14A postmarked not more than 60 days nor less than 30 days prior to such date.
- c. The actual start-up date of the presses Ref. Nos. 4A and 14A within 15 days after such date.  
(9 VAC 5-50-50)

13. **Permit Suspension/Revocation** - This permit may be suspended or revoked if the permittee:

- a. Knowingly makes material misstatements in the permit application or any amendments to it;
- b. Fails to comply with the conditions of this permit;
- c. Fails to comply with any emission standards applicable to a permitted emissions unit, ;
- d. Causes emissions from the stationary source which result in violations of , or interfere with the attainment and maintenance of, any ambient air quality standard; or
- e. Fails to operate in conformance with any applicable control strategy, including any emission standards or emission limitations, in the State Implementation Plan in effect at the time an application for this permit is submitted.

(9 VAC 5-80-1010)

14. **Right of Entry** - The permittee shall allow authorized local, state, and federal representatives, upon the presentation of credentials:

- a. To enter upon the permittee's premises on which the facility is located or in which any records are required to be kept under the terms and conditions of this permit;
- b. To have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit or the State Air Pollution Control Board Regulations;
- c. To inspect at reasonable times any facility, equipment, or process subject to the terms and conditions of this permit or the State Air Pollution Control Board Regulations; and
- d. To sample or test at reasonable times.

For purposes of this condition, the time for inspection shall be deemed reasonable during regular business hours or whenever the facility is in operation. Nothing contained herein shall make an inspection time unreasonable during an emergency.

(9 VAC 5-170-130 and 9 VAC 5-80-850)

15. **Maintenance/Operating Procedures** – At all times, including periods of start-up, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate the affected source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions.

(9 VAC 5-50-20 E and 9 VAC 5-80-850)

16. **Record of Malfunctions** – The permittee shall maintain records of the occurrence and duration of any bypass, malfunction, shutdown or failure of the facility or its associated air pollution control equipment that results in excess emissions for more than one hour. Records shall include the date, time, duration, description (emission unit, pollutant affected, cause), corrective action, preventive measures taken and name of person generating the record.  
(9VAC 5-20-180 J and 9 VAC 5-80-850)
17. **Notification for Facility or Control Equipment Malfunction** - The permittee shall furnish notification to the Director, Tidewater Regional Office of malfunctions of the affected facility or related air pollution control equipment that may cause excess emissions for more than one hour, by facsimile transmission, telephone or telegraph. Such notification shall be made as soon as practicable but no later than four daytime business hours after the malfunction is discovered. The permittee shall provide a written statement giving all pertinent facts, including the estimated duration of the breakdown, within two weeks of discovery of the malfunction. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the permittee shall notify the Director, Tidewater Regional Office.  
(9 VAC 5-20-180 C and 9 VAC 5-80-850)
18. **Violation of Ambient Air Quality Standard** - The permittee shall, upon request of the DEQ, reduce the level of operation or shut down a facility, as necessary to avoid violating any primary ambient air quality standard and shall not return to normal operation until such time as the ambient air quality standard will not be violated.  
(9 VAC 5-20-180 I and 9 VAC 5-80-850)
19. **Change of Ownership** - In the case of a transfer of ownership of a stationary source, the new owner shall abide by any current permit issued to the previous owner. The new owner shall notify the Director, Tidewater Regional Office of the change of ownership within 30 days of the transfer.  
(9 VAC 5-80-940)
20. **Permit Copy** - The permittee shall keep a copy of this permit on the premises of the facility to which it applies.  
(9 VAC 5-80-860 D)

## **DRAFT PERMIT APPROVAL FORM**

Department of Environmental Quality  
Tidewater Regional Office  
5636 Southern Blvd.  
Virginia Beach, Virginia 23462

### **Instructions:**

The "Draft Permit Approval Form" provides the owner or certified company official an opportunity to accept or suggest appropriate changes to a draft permit. If a signed form is not received within one (1) week of the date of receipt of the draft permit, DEQ will assume that the draft permit is considered acceptable and will proceed with processing the permit. **Please check the applicable statement(s) below after thoroughly reviewing the draft permit. Forms may be returned by facsimile to 757-518-2009.**

**Attention:** Mr. Steve Hackney or Ms. Jane A. Workman.

\_\_\_\_\_ The owner or certified company official agrees with the conditions of the draft permit  
dated December 27, 2007. Please proceed to issue the permit with no change.

\_\_\_\_\_ The owner or certified company official finds condition number(s)  
\_\_\_\_\_ of the draft permit dated \_\_\_\_\_ unacceptable.

\_\_\_\_\_ The suggested changes are attached for your consideration.

\_\_\_\_\_ The owner or certified company official requests further discussion with DEQ regarding  
the above referenced condition(s).

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Facility: \_\_\_\_\_

Date: \_\_\_\_\_